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14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**
18

19 OWEN DIAZ,
20 Plaintiff,
21 v.
22 TESLA, INC. d/b/a TESLA MOTORS, INC.,
23 Defendant.

Case No. 3:17-cv-06748-WHO

**DEFENDANT'S PROPOSED
IMPEACHMENT DESIGNATIONS OF
DEMETRIC DI-AZ'S DEPOSITION
TESTIMONY**

Judge: Hon. William H. Orrick

Defendant Tesla, Inc. respectfully submits the following chart identifying impeachment deposition testimony designated for the above referenced witness:

Page:Line	Deposition Excerpt	Party
31:20-32:9	31:20 Q. How would you describe your relationship with 31:21 your father? 31:22 A. My relationship with my father was good. 31:23 Q. How often do you speak to your father on 31:24 average? 31:25 A. Probably every day. One time a day at least. 32:1 Q. How often do you see your father? 32:2 A. He's been working a lot; so I might see him -- 32:3 his off days are, like, Wednesdays and Thursdays. So I 32:4 go by my mom's house and I see them. 32:5 Q. So you see him every Wednesday and Thursday? 32:6 A. Roughly, unless I have stuff I have to handle 32:7 and I can't make it out there. 32:8 Q. And where is your father working now? 32:9 A. AC Transit.	Def.
103:7-10	103:7 Q. Can you describe what Javier Caballero looks 103:8 like? 103:9 A. He's a Mexican male. That's pretty much all I 103:10 remember. I don't remember, like, full details.	Def

DATED: March 30, 2023

By: /s/ Daniel C. Posner

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